

EXHIBIT 116

00001

5 JANE DOE 1, Individually and on behalf
of all others similarly situated,
6 Plaintiff,

vs. Case No.

8 JPMORGAN CHASE BANK, N.A.,
Defendant/Third-Party
Plaintiff.

10 JPMORGAN CHASE BANK, N.A.,
Third-Party Plaintiff,
vs.

11 JAMES EDWARD STALEY,
Third-Party Defendant.

GOVERNMENT OF THE U.S. VIRGIN ISLANDS,
Plaintiff

vs. Case No.
14 22-cv-10904-JSR

15 JPMORGAN CHASE BANK, N.A.,
Defendant/Third-Party
Plaintiff.

18 JAMES EDWARD STALEY,
Third-Party Defendant.

20 VIDEOTAPED DEPOSITION of LISA WATERS
WilmerHale

21 60 State Street, Boston, Massachusetts
22 Thursday August 24 2023 - 9:40 a.m.

GOLKOW LITIGATION SERVICES 877.370.DERS

1 to remove Ms. Casey from covering Mr. Epstein?

2 A. I mean, he committed to work toward it.

3 He said he understood why she did not want to and

4 that no one should cover anyone they're

5 uncomfortable with.

6 Q. And I think you said something along the

7 lines of "we will work on that." What did you

8 understand him to mean?

9 A. Well, my understanding what that meant is
10 he would, he and the market manager or whoever
11 was managing the team, would work to find another
12 coverage person for the banking relationship
13 there.

14 Q. Do you remember anything else that

15 Ms. Casey said in that meeting?

16 A. No. I think that's what -- that was her
17 topic that she wanted to cover with him and she
18 covered that.

19 Q. Did she express an opinion in that
20 meeting about whether Mr. Epstein should or at
21 large remain a client of the Private Bank?

22 A. I don't believe so.

23 Q. What did you say in the meeting?

24 A. So again, it wasn't planned that I was

1 going to say something at the meeting; but I did
2 say to him, "You know, it's very uncomfortable
3 for anyone covering him; and no one really wants
4 to cover him. The charges are very uncomfortable
5 and involved a minor." I said, "My personal
6 opinion is I have children; I wouldn't let him be
7 around my family." I said, "How do you feel
8 about that? You have two daughters." And he
9 said, "I do understand how people could feel that
10 way, and it's difficult; but I did speak with him
11 -- Mr. Epstein -- and he said it was a
12 misunderstanding and he made a mistake. And I do
13 feel comfortable. I have socialized with him and
14 my family."

15 And he was respectful; but said, you
16 know, politely that he disagreed and that's why
17 the decision was made.

18 And I said, "Okay. It's the company you
19 keep; I don't feel it looks good for the firm and
20 it makes people uncomfortable." And he said: "I
21 appreciate you expressing your opinion."

22 He was very cordial and the discussion
23 ended.

24 Q. Do you remember anything else he said?